

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ANIKA & ASSOCIATES, INC.

PLAINTIFF

VERSUS

CIVIL ACTION NO. 3:20-cv-386-CWR-LGI

**LANDMARK AMERICAN
INSURANCE COMPANY**

DEFENDANT

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF
CASE MANAGEMENT ORDER DEADLINES**

COMES NOW the Defendant, Landmark American Insurance Company (“Landmark”), by and through its attorneys at Galloway, Johnson, Tompkins, Burr & Smith, who moves the Court to extend the discovery and motion deadlines currently set for May 7, 2021 and May 24, 2021, to **June 25, 2021 and July 23, 2021**, respectively, due to the attorneys’ schedules making completion of discovery unattainable. In support of this Motion, Landmark states:

1. On September 28, 2020, the Court entered its Case Management Order (“CMO”) [11] in this case. The CMO [11] set Plaintiff’s expert deadline on February 2, 2021, Defendant’s expert deadline on March 4, 2021, the discovery deadline on May 4, 2021, and the motion deadline on May 18, 2021. Additionally, a settlement conference is set for May 10, 2021.

2. On February 16, 2021, the Court entered its Order [33] amending the case management deadlines, setting Defendant’s expert deadline on April 5, 2021, the discovery deadline on May 7, 2021, and the motion deadline on May 24, 2021.

3. The parties have been unable to schedule depositions due to the schedules of the various attorneys. Specifically, lead counsel for Defendant has a large maritime case set for trial starting May 17, 2021, before Judge Eldon E. Fallon in the Eastern District of Louisiana.

Counsel anticipated a trial continuance, but was recently informed that no continuance would be granted in that matter.

4. The attorneys for the parties conferred on April 14, 2021 to discuss the scheduling issues. The parties are in agreement that an extension is needed, and they further agree the settlement conference set for May 10, 2021, should remain set.

5. Therefore, Landmark requests this Honorable Court extend the discovery deadline by forty-nine (49) days and the motion deadline by sixty (60) days, making the new discovery deadline **Friday, June 25, 2021**, and the new motion deadline **Friday, July 23, 2021**.

6. These extensions will not affect the settlement conference set for May 10, 2021 or the trial date already set in this matter.

7. This request is not made for engendering undue delay or for any other improper purpose.

WHEREFORE, PREMISES CONSIDERED, Defendant, Landmark American Insurance Company, moves this Honorable Court to extend the **discovery deadline to Friday, June 25, 2021**, and the **motion deadline to Friday, July 23, 2021**, along with any additional relief the Court may find appropriate under the premises.

Respectfully submitted, this 22nd day of April, 2021.

LANDMARK AMERICAN
INSURANCE COMPANY

By: /s/ Kathryn Platt
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CERTIFICATE OF SERVICE

I, Kathryn Breard Platt, one of the attorneys for Defendant, Landmark American Insurance Company, do hereby certify that I have this date served the above and foregoing *Unopposed Motion* upon all counsel of record and interested persons via the Court's ECF filing system.

So certified, this this 22nd day of April, 2021.

/s/ Kathryn Platt
KATHRYN BREARD PLATT (#102141)